

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GEORGE MOORE, individually and on Behalf of all others similarly situated,)	
)	
Plaintiff,)	Case No. 1:21-cv-01106
)	
v.)	Hon. Judge Franklin U. Valderrama
)	
LIVEFREE EMERGENCY RESPONSE, INC., <i>et al.</i> ,)	Hon. Magistrate Judge M. David Weisman
)	
Defendants.)	
)	

**NOTICE OF WITHDRAWAL OF MOTION FOR DEFAULT
JUDGMENT AND NOTICE OF DISMISSAL WITH PREJUDICE
AS TO DEFENDANT IBAN GLOBAL LLC ONLY**

Now comes the Plaintiff, GEORGE MOORE, by and through his attorneys, and hereby notifies the Court that he is withdrawing his Motion for Default Judgment Against Defendant IBAN Global LLC (Doc. #31).

Plaintiff also respectfully requests the Court dismiss this matter as to Defendant IBAN GLOBAL LLC only, with prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i). Defendant IBAN GLOBAL LLC has not yet filed an answer or a motion for summary judgment.

RESPECTFULLY SUBMITTED,

GEORGE MOORE

/s/ David B. Levin
Attorney for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2022 a copy of the foregoing Notice of Dismissal with Prejudice was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. I further certify that a copy was also served on the following individual via email transmission at the email address listed below.

IBAN Global LLC
c/o Jeffrey Torres, Managing Member
1712 Pioneer Ave., Suite 500
Cheyenne, WY 82001
jefftinc@gmail.com

/s/ David B. Levin
Attorney for Plaintiff